

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHER DISTRICT OF ILLINOIS**

IN RE: Debra R. Simpkins

Debtor.

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Case No: 08-30025
Hon. Kenneth J. Meyers
Chapter: 7

MOTION TO REOPEN CASE

Now comes Debra R. Simpkins (hereinafter referred to as “DEBTOR”), by and through her attorneys, MACEY BANKRUPTCY LAW P.C., and moves this Honorable Court to enter an Order to Reopen their case and allow Debtor to further notify the Chapter 7 Trustee and requests a written notice of abandonment of their claims made in the collective action case styled as *Debra Simpkins et al. vs. Wells Fargo Insurance, Co. et al.*, 3:12-cv-00768-DRH-PMF in the United States District Court for the Southern District of Illinois. In support for her motion, Debtor states:

1. The Debtor’s case was filed on January 8, 2008.
2. Debtor’s case was closed on August 5, 2009 with an Order Discharging Chapter 7 Debtor.
3. At the time of filing, Debtor had no knowledge of any cause of action against the defendants in the above suit.
4. When the Order to reopen is granted Debtor will amend schedules to appropriately schedule the asset of the cause of action and use all available exemptions allowed.

Wherefore, the Debtor moves the Court for an Order reopening this bankruptcy case so that (without limitation) Debtor may amend schedules and request a formal written notice of abandonment from the chapter 7 trustee of Debtor’s claims in the case *Debra Simpkins et al. vs. Wells Fargo Insurance, Co. et al.*, 3:12-cv-00768-DRH-PMF in the United States District Court for the Southern District of Illinois, and for an Order

Discharging the Debtor be granted and for other relief as this Court deems just.

Dated: January 26, 2013

RESPECTFULLY SUBMITTED
Macey Bankruptcy, P.C.
/s/ Andrew Magdy
Andrew Magdy, #60390MO
515 Olive St., #702
St. Louis, MO 63101
Phone 314-588-1520
Fax 314-588-1476
amagdy@maceybankruptcylaw.com

**IN THE UNITED STATES BANKRUPTCY COURT
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Debtor.

Certificate of Service

The undersigned hereby certifies that a copy of Debtors' Motion to Reopen Case was served either through the Court's ECF system or by regular mail, this 26th day of January, 2013, to:

RESPECTFULLY SUBMITTED
Macey Bankruptcy, P.C.
/s/ Andrew Magdy
Andrew Magdy, #60390MO
515 Olive St., #702
St. Louis, MO 63101
Phone 314-588-1520
Fax 314-588-1476
amagdy@maceybankruptcylaw.com

Via ECF:
Office of the U.S. Trustee

Donald M. Samson

Via regular mail:

Academy Collection Service, Inc.
10965 Decatur Road
Philadelphia, PA 19154-3210

All Kids and Family Care
P.O. Box 19121
Springfield, IL 62794-9121

AmerenIP
P.O. Box 2522
Decatur, IL 62525-2522

Atlantic Credit & Finance, Inc.
P.O. Box 13525
Roanoke, VA 24035-3525

Bank of America
P.O. Box 2493
Norfolk, VA 23510-2493

Bank of America
P.O. Box 1390
Norfolk, VA 23501-1390

Bank of America
P.O. Box 15726
Wilmington, DE 19886-5726

Bill Me Later
P.O. Box 105658
Atlanta, GA 30348-5658

Bureau of Collection Recovery, Inc.
7575 Corporate Way
Eden Prairie, MN 55344

Capital One Auto Finance
3901 Dallas Parkway
Plano, TX 75093-7864

Capital One Bank
P.O. Box 790216
Saint Louis, MO 63179-0216

Care Credit
GE Money Bank
P.O. Box 960061
Orlando, FL 32896-0061

Chase Cardmember Service
Attn: Credit Bureau Updates
PO Box 15919
Wilmington, DE 19850-5919

Circuit City
Chase Cardmember Services
P.O. Box 94010
Palatine, IL 60094-4010

Citi Financial Mortgage
PO Box 140069
Irving, TX 75014-0069

DirecTV
PO Box 9001069
Louisville, KY 40290-1069

Fingerhut
P.O. Box 166
Newark, NJ 07101-0166

First Bank
14001 Manchester Road
Ballwin, MO 63011

Foot Action USA
PO Box 2974
Shawnee Mission, KS 66201-2974

Gateway Metro Credit Union
1001 Pine Street
Saint Louis, MO 63101

Ginny's
1112 7th Avenue
Monroe, WI 53566

Global Vantage, Inc.
Attn: Payment Processing
P.O. Box 3458
San Rafael, CA 94912-3458

Gordman's
P.O. Box 659705
San Antonio, TX 78265-9705

H. Gary Apoian
Attorney At Law
2810 Frank Scott Parkway, West
Suite 700
Belleville, IL 62223

Home Depot
Bankruptcy Division
P. O. Box 20507
Kansas City, MO 65195-0507

HSBC
Attn: Bankruptcy Dept.
PO Box 5213
Carol Stream, IL 60197-5213

HSBC Auto Finance
Bankruptcy Notices
PO Box 17909
San Diego, CA 92177-7909

Illinois Department of Human
Servic
Case Management Unit
P. O. Box 19407
Springfield, IL 62794-9407

Investment Retrievers
4511 Golden Foothill Parkway
El Dorado Hills, CA 95762

Kohl's
PO Box 8615
Hagerstown, MD 21748-8615

Macy's
111 Boulder Industrial Drive
Bridgeton, MO 63044

MBNA America
PO Box 15137
Wilmington, DE 19886-5137

Memorial Hospital
P.O. Box 18200F
Saint Louis, MO 63150-8200

Montgomery Ward
7840 Roswell Road
Building 100, Suite 210
Atlanta, GA 30350

National Arbitration Forum
P.O. Box 50191
Minneapolis, MN 55405-0191

National City
Attn: Bankruptcy Dept.
3232 Newmark Drive
Miamisburg, OH 45342

NCO Financial Systems, Inc.
P.O. Box 41457
Philadelphia, PA 19101-1457

OAC
PO Box 35607
Greensboro, NC 27425-5607

Portfolio Recovery Associates, LLC
P.O. Box 12914
Norfolk, VA 23541-2914

Resurgent Capital Services
P.O. Box 10587
Greenville, SC 29603-0587

Riddle & Associates, P.C.
PO Box 1187
Sandy, UT 84091-1187

Sam's Club
PO Box 103104
Roswell, GA 30076-3104

Scott Credit Union
302 West Winters Street
Scott Afb, IL 62225-1602

Spiegel
Card Processing Center
P.O. Box 5811
Hicksville, NY 11802-5811

St. Clair Township Sewer Dept.
P.O. Box 23685
Belleville, IL 62223-3685

St. Elizabeth's Hospital
211 South Third Street
Belleville, IL 62222

State Collection Service
P.O. Box 6586
Madison, WI 53716-0586

Storment Law Office
Paul M. Storment, III
424 South High Street
Belleville, IL 62220

Through the Country Door
1112 7th Avenue
Monroe, WI 53566-1364

Tiburon Financial, L.L.C.
P.O. Box 770
Boys Town, NE 68010-0770

US Bank
Bankruptcy Department
P.O. Box 5227
Cincinnati, OH 45202-5227

US Cellular
PO Box 0203
Palatine, IL 60055-0203

Value City Furniture
P.O. Box 182273
Columbus, OH 43218-2273

Vantage Credit Union
4020 Fee Fee Rd
Bridgeton, MO 63044

Wal-Mart
P.O. Box 530929
Atlanta, GA 30353-0929

Washington Mutual Card Services
Attn: Bankruptcy Dept.
PO Box 10467
Greenville, SC 29603-0467

Wells Fargo
Ccg Collection Servicing
Mac X2505-016 Po Box 10438
Des Moines, IA 50306

Wells Fargo Financial
525 Lincoln Highway
Suite 10
Fairview Heights, IL 62208

Wells Fargo Home Mortgage
3476 Stateview Boulevard
Fort Mill, SC 29715

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